



**Todd & Weld**LLP

Howard M. Cooper  
E-mail: hcooper@toddweld.com

April 15, 2021

**VIA ECF**

Honorable Loretta A. Preska  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

**Re: *Giuffre v. Dershowitz*, Case No.: 19-cv-03377-LAP**

Defendant's Response to Miami Herald Motion to Intervene and Unseal (ECF No. 270)

Dear Judge Preska:

Defendant Alan Dershowitz ("Professor Dershowitz") hereby responds to the Miami Herald's Letter Motion to Intervene and Unseal (ECF No. 270). Professor Dershowitz does not oppose the relief sought by the Miami Herald.

Professor Dershowitz has consistently advocated for these proceedings to be fully open to the public, with very limited exceptions for private medical and financial information, neither of which are implicated by the Herald's letter motion. Although some of the information which the Herald seeks to unseal was nominally filed under seal by Professor Dershowitz, this was solely because Professor Dershowitz was required to do so by the terms of various protective orders and the designation of materials as confidential by others. Professor Dershowitz does not believe that these materials are properly entitled to confidentiality as requested by the designating party, but he cannot as a practical matter relitigate this issue every time he files a pleading which references or attaches discovery material which has been designated confidential by Plaintiff or by a non-party such as Mr. Zeiger, for example.

Respectfully submitted,

/s/ Howard M. Cooper  
Howard M. Cooper

cc: Counsel of record, via ECF